

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP  
ONE MANHATTAN WEST  
NEW YORK, NY 10001

FIRM/AFFILIATE OFFICES  
-----  
BOSTON  
CHICAGO  
HOUSTON  
LOS ANGELES  
PALO ALTO  
WASHINGTON, D.C.  
WILMINGTON

TEL: (212) 735-3000  
FAX: (212) 735-2000  
[www.skadden.com](http://www.skadden.com)

DIRECT DIAL  
(212) 735-2588  
DIRECT FAX  
(917) 777-2588  
EMAIL ADDRESS  
[JESSICA.DAVIDSON@SKADDEN.COM](mailto:JESSICA.DAVIDSON@SKADDEN.COM)

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March 23, 2023

**VIA ECF**

The Hon. Robert B. Kugler  
United States District Judge  
USDJ, District of New Jersey  
Mitchell H. Cohen Building & U.S.  
Courthouse  
4th & Cooper Streets, Room 1050  
Camden, NJ 08101

Special Master  
Hon. Thomas Vanaskie  
Stevens & Lee  
1500 Market Street, East  
Tower, 18th Floor  
Philadelphia, PA 19103

RE: *In re Valsartan, Losartan, and Irbesartan Products Liability Litigation*,  
No. 1:19-md-2875-RBK-KMW (D.N.J.)

Dear Judge Kugler and Judge Vanaskie:

I am writing as Liaison Counsel for Manufacturer Defendants to request that the Court enter the attached proposed order amending Case Management Order No. 29 to reflect the parties' agreement to a short extension of the current deadlines for filing opposition and reply briefs in connection with the parties' *Daubert* motions. The parties have also agreed that plaintiffs may file two briefs in opposition to defendants' Motion To Partially Exclude Opinions Of Drs. Stephen Hecht And Ramin Najafi ([ECF No. 2292](#)) in order to address each of these proposed experts separately, and that defendants may file two reply briefs in support of the motion.

As set forth in the attached proposed order, the new briefing deadlines agreed upon by the parties are as follows:

- Responsive briefs in opposition to *Daubert* motions: April 11, 2023
- Reply briefs in support of *Daubert* motions: April 25, 2023

The Honorable Robert B. Kugler  
March 23, 2023  
Page 2

Thank you for your consideration of this request.

Respectfully Submitted,



Jessica Davidson

Enclosure

CC: All Counsel (via ECF)